

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Civil Action No.: 1:23-cv-00423-WO-JLW

TIMIA CHAPLIN and PAULINO
CASTELLANOS, on behalf of
themselves and all others
similarly situated,

Plaintiffs,

v.

WILLIE R. ROWE, in his capacity
as Sheriff of Wake County; JOHN
DOE SURETY, as surety for the
Sheriff of Wake County, BRIAN
ESTES, in his official capacity
as the Sheriff of Lee County;
JOHN DOE SURETY, as surety for
the Sheriff of Lee County, TYLER
TECHNOLOGIES, INC.; and DOES 1
THROUGH 20, INCLUSIVE,

Defendants.

TYLER TECHNOLOGIES, INC.'S
CONSENT MOTION FOR EXTENSION
OF TIME TO RESPOND TO
COMPLAINT

Pursuant to Local Rule 6.1(a) and Rule 6(b) of the
Federal Rules of Civil Procedure, Defendant Tyler
Technologies, Inc. ("Tyler Technologies"), moves this Court
for a fourteen-day extension of time, through and including
September 20, 2023, to answer or otherwise respond to
Plaintiffs' Complaint - Class Action ("Complaint"). In
support of this motion, Tyler Technologies states the
following:

1. Plaintiffs filed the Complaint on May 23, 2023.
2. Plaintiffs purported to serve the summons and Complaint on Tyler Technologies by mailing it via overnight delivery for delivery on August 16, 2023. Service on this date would result in a response date of September 6, 2023.
3. The time within which Tyler Technologies must answer or otherwise respond to the Complaint has not expired.
4. Tyler Technologies requests a modest extension of time to respond to the Complaint in light of obligations in other matters and the Labor Day Holiday Weekend. The requested extension will facilitate Tyler Technologies' preparation of a focused response.
5. This Motion is made in good faith and not for the purpose of undue delay.
6. Tyler Technologies' counsel has conferred with the Plaintiffs' counsel, and Plaintiffs' counsel consents to the requested extension.
7. Tyler Technologies reserves all defenses, claims and arguments.

WHEREFORE, Tyler Technologies respectfully requests the Court extend by fourteen days Tyler Technologies' deadline to answer or otherwise respond to the complaint, through and including September 20, 2023.

This 30th day of August, 2023.

s/ Gregory L. Skidmore
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